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November 14, 2014

BY ECF

Honorable Eric N. Vitaliano
United States District Court
Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201

Re: *United States v. Abraxas J. Discala et al.*, 14 CR 399 (ENV)
Defendant Josephberg's Travel Request

Dear Judge Vitaliano:

We represent Craig Josephberg in the above-captioned case, and write to request permission for Mr. Josephberg to travel outside the geographic areas set as a condition of his bail. Specifically, Mr. Josephberg would like to travel to Florida from December 29, 2014 to January 3, 2015. Mr. Josephberg and his family would be staying with his sister at her residence in Miami from December 29th through January 1st, and with his sister at a rented house in Key Largo from January 1st through January 3rd. Neither the government (AUSA Shannon Jones) nor Pretrial Services (Officer Ashley Calvi) has any objection to this request.

Currently, Josephberg's conditions of release permit him to travel within New York, New Jersey, and Connecticut. Accordingly, we respectfully request the Court to modify Mr. Josephberg's bail conditions so that he may travel on the above-listed dates to Florida. The details of Mr. Josephberg's travel will be provided to Pretrial Services. In addition, Mr. Josephberg will have his cellular telephone with him at all times.

Thank you for your consideration of this application. I am available at the Court's convenience if Your Honor has any questions.

Respectfully submitted,

/s/

Amy Walsh